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of Bernard L. Madoff Investment Securities LLC
and the Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

ANDREW H. MADOFF, individually and as
Executor of the Estate of Mark D. Madoff,
ESTATE OF MARK D. MADOFF, STEPHANIE
S. MACK, and DEBORAH MADOFF,

Defendants.

Adv. Pro. No. 09-1503 (SMB)

**STIPULATION FOR VOLUNTARY DISMISSAL
OF DEFENDANT DEBORAH MADOFF WITH PREJUDICE**

Irving H. Picard (the “Trustee”), as trustee for the liquidation of the business of Bernard L. Madoff Investment Securities LLC (“BLMIS”) under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa, *et seq.*, and the substantively consolidated estate of Bernard L. Madoff individually, and defendants Andrew H. Madoff, the Estate of Mark D. Madoff, Stephanie S. Mack, and Deborah Madoff (together the “Defendants,” and collectively with the Trustee, the “Parties”), by and through their undersigned counsel, hereby stipulate and agree to the following:

1. On May 4, 2012, the Trustee filed and served the Second Amended Complaint against the Defendants in the above-captioned proceeding (the “Adversary Proceeding”). On April 2, 2012, Deborah Madoff moved to withdraw the reference from this Court, and the Trustee subsequently adjourned the time for Deborah Madoff to respond to the Second Amended Complaint.

2. In accordance with Federal Rule of Bankruptcy Procedure 7041(a)(1)(A)(ii), and Federal Rule of Civil Procedure 41(a)(1), the Parties hereby stipulate to a dismissal with prejudice of the Trustee’s claims in the Adversary Proceeding against Deborah Madoff. Nothing herein shall affect the Trustee’s claims in the Adversary Proceeding against any defendant other than Deborah Madoff, and the Trustee hereby preserves all his rights and claims against any defendant other than Deborah Madoff. Upon the dismissal of Deborah Madoff, the caption of the Adversary Proceeding is hereby amended to delete Deborah Madoff from the caption. The amended caption of the Adversary Proceeding shall appear as indicated in Exhibit A hereto.

3. The provisions of this Stipulation shall be binding upon and shall inure to the benefit of the Parties and their respective successors and assigns and upon all creditors and parties of interest.

Dated: June 27, 2014

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